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15 Murray Bockhold and G.R. Dawson
16 Holdings

17 UNITED STATES BANKRUPTCY COURT

18 DISTRICT OF NEVADA

19 * * *

20 In re:

21 Case No. BK-13-51496-GWZ
22 Chapter 11

23 GRYPHON GOLD CORPORATION,

24 Debtor

25 **STIPULATION EXTENDING TIME**
26 **TO FILE REPLY IN SUPPORT**
27 **OF MOTION FOR ORDER**
28 **UNSEALING DOCUMENT**
FILED UNDER SEAL

Orig. Hearing Date : 03/01/2016
Orig. Hearing Time: 2:00 P.M.

Cont. Hearing Date: 03/22/2016
Cont. Hearing Time: 2:00 P.M.

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31 This Stipulation Extending Time to File Reply in Support of Motion for Order
32 Unsealing Document Filed Under Seal is entered into by and between John F. Murtha,
33 Esq. on behalf of movants Murray Bockhold and G.R. Dawson ("Bockhold-Dawson"),
34 and Laura Granier, Esq. on behalf of Waterton Global Value, L.P. ("Waterton") and is

1 based upon the following facts and circumstances:

2 1. On January 20, 2016, Bockhold-Dawson filed a Motion for Order
3 Unsealing Document Filed Under Seal ("Motion") (Docket No. 525).

4 2. When the Motion was filed, a hearing was set for March 1, 2016.

5 3. Waterton filed a timely objection to the Motion on February 16, 2016
6 (Docket No. 529).

7 4. Based upon the hearing date of March 1, 2016, Bockhold-Dawson's reply
8 in support of the Motion was due on February 23, 2016.

9 5. Subsequent to the filing of Waterton's opposition, the Court re-set the
10 hearing on the Motion to March 22, 2016, at 2:00 p.m. (Docket No. 534)

11 6. Counsel for Bockhold-Dawson has requested an extension of time to file
12 Bockhold-Dawson's reply in support of the Motion because of a very busy work
13 schedule. He proposed to file the reply well in advance of the March 22nd hearing to
14 allow the Court ample time to review all of the pleadings regarding the Motion in advance
15 of the hearing.
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17 7. Waterton's counsel is amenable to the requested extension of time.

18 Now, therefore, it is hereby agreed and stipulated by and between the
19 undersigned counsel of record for Bockhold-Dawson and Waterton that Bockhold-
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1 Dawson may have until March 4, 2016, to file their reply in support of the Motion. That
2 date is 18 days prior to the rescheduled hearing date.

3 DATED this 23rd day of February, 2016.

4 WOODBURN AND WEDGE

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6 BY 

John F. Murtha, Esq.,
Seth J. Adams, Esq.
Attorneys for Bockhold-Dawson

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10 DATED this 23rd day of February, 2016.

11 DAVIS GRAHAM & STUBBS, LLP

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13 BY /s/ Laura K. Granier

Laura K. Granier, Esq.,
Attorneys for Waterton
Global Value, L.P.